



relating to this particular semantic net. (Note that Rada does not disclose this particular semantic net in whole, but instead refers to selected properties or characteristics of it). For example, Figure 9 indicates that the term "Microtext Exercises" occurred 12 times as a source node name in the "Hypertext" semantic net.

Rada goes on to describe in Section 4 (e.g. on page 133) that a linear document can be automatically generated from a semantic net by automatically traversing the semantic net, for example to print the contents of the semantic net in a linear form. Section 4.1 discusses different techniques for automatically traversing the semantic net. Section 4.2 discusses showing the structure of "deeper models" or a more complex semantic net, in a linear outline (e.g. Figure 13). Section 4.3 discusses the place of titles and captions in the automatically generated linear document, and suggests that captions (e.g. a target node name) can be placed in the margin next to a corresponding paragraph. For example, if a node-link-node triple points to a paragraph, then when the paragraph is printed, the name of the target node of the triple is printed next to it in the margin. See, e.g., Rada at page 136, text near the center of the page. Section 4.4 discusses the issue of "local cohesion", for example how to provide or ensure logically and aesthetically smooth transitions from one component of text to a next component of text. Rada's Section 5, the author summarizes general remarks regarding semantic nets.

However, Rada does not disclose or suggest the features that the Examiner says it does.

The Examiner asserts on page three of the Office Action that Rada discloses in Section 3.2 logging different search requests received from different users, as encompassed by Claim 1. This is incorrect. Section 3.2 of Rada merely a particular semantic net that has particular link names, source node names, and target node names, each name occurring a specific and often different number of times in that semantic net, as shown in Figures 8-10. There is no mention of search requests, or of logging search requests.

The Examiner asserts on page three of the Office Action that Rada discloses in Section 4, "*expanding the logged search requests*" as recited in Claim 1. This is incorrect. Section 4 does

not disclose or mention search requests, and does not disclose or suggest expanding search requests, much less logged search requests. Instead, Section 4 discloses methods for automatically printing the entire contents of a semantic net in a linear form, by automatically traversing the semantic net and printing the contents as they are encountered during the traverse.

The Examiner asserts on page three of the Office Action that Sections 2.4, 3.2 of Rada disclose *"applying a statistical clustering algorithm to the expanded logged search requests based on content of the expanded logged search requests, thereby grouping similar search requests together"*, as recited in Claim 1. This is incorrect, because Section 2.4 merely describes an exemplary structure of an exemplary semantic net (see, e.g., Figure 5), and Section 3.2 merely shows the contents of a different exemplary semantic net, e.g. specific labels and the number of times they occur in that particular semantic net (e.g., 227 occurrences of the link name "include" as shown in Figure 8). There is no disclosure of search requests, of applying a statistical clustering algorithm to search requests of any kind, or of grouping similar search requests.

The Examiner asserts on page three of the Office Action that Section 2.1 of Rada discloses *"identifying, using a semantic net hierarchy, a lowest-level term in the hierarchy that subsumes all queries in a grouping of search requests"*, as recited in independent Claim 1. This is incorrect, because Section 2.1 merely discloses an element of a semantic net structure, in particular a "node-link-node" triple, with a text paragraph associated with (e.g., pointed to by) the link of the triple. See for example, Figure 2. In particular, Section 2.1 indicates that a semantic net is a graph where natural language terms have been used to label nodes and links (e.g., page 126, lines 6-7), and further indicates that some semantic links can manifest inheritance. But, Section 2.1 fails to disclose or suggest *"identifying, using a semantic net hierarchy, a lowest-level term in the hierarchy"*. Section 2.1 likewise fails to disclose or suggest *"identifying... a lowest-level term... that subsumes all queries in a grouping of search requests"*, because Section 2.1 does not disclose or suggest grouping search requests, does not disclose or suggest analyzing queries in such a grouping, and fails to disclose or suggest identifying a lowest level term that subsumes the queries.

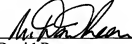


**CONCLUSION**

In view of the above amendment, applicant believes the pending application is in condition for allowance. Favorable consideration on the merits and prompt allowance are respectfully requested. In the event any questions arise regarding this communication or the application in general, the Examiner is invited to contact Applicants' undersigned representative at 1.206.262.8900.

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Respectfully submitted,

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